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Attorney for Defendant
PARNIAN DJAFARZADEH

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 16-CR-00171-CRB
)	
Plaintiff,)	PROPOSED ORDER AND
)	STIPULATION EXCLUDING
v.)	TIME FROM DECEMBER 14,
)	2016 THROUGH FEBRUARY
PARNIAN DJAFARZADEH,)	22, 2017 FROM THE SPEEDY
)	TRIAL ACT CALCULATION
Defendant.)	(18 U.S.C. § 3161(h)(7)(A))

IT IS HEREBY STIPULATED, by and between the parties to this action, that the status conference, presently scheduled at 2:00 p.m. on December 14, 2016, before the Honorable Charles R. Breyer, be rescheduled for February 22, 2017 at 2:00 p.m. The government has produced substantial discovery amounting to 51,214 pages of documents. The parties agree and stipulate that defense counsel needs time to review discovery in the case and that an exclusion of time under the Speedy Trial Act for effective preparation of counsel is warranted pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(iv) between December 14, 2016 and February 22, 2017.

Undersigned defense counsel represents that he has spoken with his client, and she agrees to the continuance and to time being excluded as requested.

The parties agree, and the Court finds and holds, as follows:

1 1. The defendant agrees to an exclusion of time under the Speedy Trial Act from
2 December 14, 2016 through February 22, 2017, based upon the need for effective preparation
3 of counsel and to provide the defendant an opportunity to review discovery and prepare the
4 case for further disposition.

5 2. Counsel for the defendant believes that the exclusion of time is in the defendant's
6 best interest.

7 3. Given these circumstances, the Court finds that the ends of justice served by
8 excluding the period from December 14, 2016 to February 22, 2017, outweigh the best
9 interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

10 4. Accordingly, and with the consent of the defendant, the Court orders that the
11 period from December 14, 2016 to February 22, 2017, shall be excluded from Speedy Trial
12 Act calculations under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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14 IT IS SO STIPULATED:

15 DATE: December 6, 2016

_____/s/_____
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DOUGLAS I. HORNGRAD

Attorney for Defendant Parnian Djafarzadeh

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18 DATE: December 6, 2016

_____/s/_____
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THOMAS MOORE

Assistant United States Attorney
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~~[PROPOSED]~~ ORDER

The Court hereby changes the status hearing scheduled for December 14, 2016 to February 22, 2017. Based upon the representation of counsel and for good cause shown, the Court also finds that failing to exclude the time between December 14, 2016 and February 22, 2017, would unreasonably deprive the defendant of the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between December 14, 2016 and February 22, 2017 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between December 14, 2016 and February 22, 2017, shall be excluded from computation under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7) and (B)(iv).

IT IS SO ORDERED.

DATED: 12/7/2016



HON. CHARLES BREYER
United States District Judge